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UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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IN RE	:	Chapter 11
	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	(Jointly Administered)
Debtors.	:	
-----X	:	

CURE CLAIM OF ORIX WARREN, LLC

Orix Warren, LLC (“Orix”), by and through its undersigned counsel, hereby asserts its “Cure Claim” in accordance with Section 8.2(b) of the *First Amended Joint Plan of Reorganization of Delphi Corporation and Certain Affiliates, Debtors and Debtors-In-Possession* (“Plan”).

1. ORIX and Delphi Automotive Systems, LLC (“Delphi Auto”), one of the above-captioned debtors and debtors-in-possession are parties to a certain *Lease* (“Lease”) for non-residential real property located at 4551 Research Parkway, Warren, Ohio (“Premises”).

2. Pursuant to 11 U.S.C. § 365(b) and Section 8.2(b) of the Plan, Delphi Auto is required to cure all defaults that exist under the Lease prior to the time Delphi Auto actually assumes the Lease. Delphi Auto is currently in default under the Lease.

3. Delphi Auto has failed to maintain the parking lot that is located at the Premises in good condition and repair as required by the terms of the Lease. As a result, Delphi Auto is in default of the terms of Article 9 of the Lease.

4. Additionally, Delphi Auto must:

- cure any additional defaults that may occur under the Lease subsequent to the filing of this Cure Claim and prior to the date upon which the Lease is actually assumed;
- remain obligated to pay any taxes and assessments that are currently due, or which may become due in the future, with respect to the Premises without regard to the period in which such taxes and assessments accrued. *See e.g.*, Lease at § 5.2; and
- pay all attorneys' fees and costs incurred by Orix in connection with preserving its rights and interests under the Lease.

Dated: March 4, 2008

CONNOLLY BOVE LODGE & HUTZ LLP

/s/ Jeffrey C. Wisler

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